

# **EXHIBIT 13**

**THE LAW OFFICE OF CAREY R. DUNNE, PLLC**

*By email*

March 27, 2023

The Honorable Jim Jordan  
2138 Rayburn House Office Building  
Washington, DC 20515

Dear Chairman Jordan:

I am in receipt of your letter dated March 22, 2023 (“the Committee Letter”), requesting that I provide to the House Committee on the Judiciary (“the Committee”) certain documents and information relating to my tenure at the Office of the New York County District Attorney (“the Office”).<sup>1</sup> I understand you sent a similar request directly to the Office on March 20, 2023, and that the Office responded to that letter on March 23, 2023.

Any information I have regarding the Office’s investigations, communications, and decision-making is derivative of my work as an attorney for the Office. The Office has directed me until further notice to decline to provide the Committee with the requested information and materials, and to instead refer the Committee to the Office for any further response. (A copy of the Office’s letter to me is attached.) As you know, the Office has deemed your request to be constitutionally infirm on federalism and other grounds, and improperly intrusive into an ongoing criminal investigation. The Office also asserts that the attorney-client privilege, the work product doctrine, and other legal protections are implicated by your requests. As the legal holder of such privileges, that is the Office’s prerogative. As a former attorney for the office, I will comply with its direction, and I respectfully refer the Committee to the Office for any further response.

Sincerely,



Carey R. Dunne

cc: The Honorable Jerrold Nadler, Ranking Member  
Leslie Dubeck, General Counsel, Office of the New York County District Attorney

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<sup>1</sup> To correct a misunderstanding in the Committee Letter: I served from January 1, 2017 to December 31, 2021 as General Counsel to the Office; I then served from January 1, 2022 to February 24, 2022 as a Special Assistant District Attorney.



**DISTRICT ATTORNEY**  
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ALVIN L. BRAGG, JR.  
DISTRICT ATTORNEY

LESLIE B. DUBECK  
GENERAL COUNSEL

March 25, 2023

By email

Mr. Carey R. Dunne  
Former Assistant District Attorney  
& General Counsel, New York County  
New York, NY

Dear Mr. Dunne:

I am writing regarding the House Judiciary Committee (HJC) request of March 22, 2023, that you provide documents and information relating to your employment at the Office of the District Attorney of New York County (the "DA's Office"), which are similar to requests sent to the DA's Office on March 20, 2023.

The HJC's requests raise significant concerns about federalism, state sovereignty, the limits on congressional power, and the purpose and legality of the HJC's inquiry. In addition, the documents and information requested are protected from disclosure for many reasons, including because they relate to an ongoing criminal investigation, and are subject to the attorney client privilege, work product doctrine, and other legal protections.

For these reasons, the DA's Office has asked the HJC to provide additional information regarding their inquiries. To protect the DA's Office's interests and privileges, and until further notice, the DA's Office instructs you, as a former employee and attorney of the DA's Office, to not provide any information or materials relating to your work in the DA's Office in response to HJC's request. In addition, please direct HJC to communicate with the DA's Office regarding the request.

Sincerely,

A handwritten signature in black ink, appearing to read "Leslie B. Dubeck".

Leslie B. Dubeck  
General Counsel